

2014 Kensington Fuel Depot Environmental Assessment OBJECTIONS
by Gary L. Sonnenberg 27 Nov 2015

The following objections reference Draft Decision Notice of the No Significant Impact 2014 Kensington Fuel Depot unless otherwise noted. The project located on the Juneau Ranger District, Tongass National Forest

Objection 1: Page 3, Introduction

Stating a “need for reliable fuel supply that will allow for continuous operation in an economically viable manner.” is representative of the entire EA process for this project. It is a general statement that does not address a “need” to change from a fuel supply method that underwent EIS process to a fuel supply, storage and distribution system that was inadequately analyzed. The current “fuel system” referred to as Alternative 1 is a fully containerized freight system governed by different laws and regulations than the proposed Alternative 2 system that introduces bulk fuel transport, bulk transfer, bulk storage, and distribution of petroleum product.

The “need” statement would be as relevant if it said that a reliable air supply will allow for continuous operation.

Objection 2: Page 4, Decision Rational

No “significant effects that were not previously analyzed in the 2004 FSEIS” were identified or analyzed in this EA. The 2004 FSEIS analyzed and evaluated different types of fuel and means to provide fuel to the mining operation and concluded that the containerized delivery of diesel fuel was most advantageous. This containerized fuel supply was incorporated into the mine plan of operation which is part of the 2004 FSEIS documentation. The EA considered only two alternatives: Alternative 1, current, approved, containerized diesel, and Alternative 2, that substitutes bulk diesel transport, bulk transfer, bulk storage, and distribution of diesel product. As well as not identifying or analyzing “significant effects” of Alternative 1, the “significant effects” of changing fuel supply should not be dismissed with after the fact “update” of “the approved Plan of Operation.”

Objection 3: Page 4, Public Involvement, Concern about EIS

“Significant issues” and “significant effects” were recognized and expressed in public responses and resource specialist [FS Interdisciplinary Team (IDT)] reports. The fact that they were ignored, trivialized or dismissed in the decision does not diminish their significance.

Objection 4: Page 4, Public Involvement, Concern about cumulative impacts

The proposed Alternative 2 is completely different than Alternative 1 so stating, “There already exists a fueling system” is another misleading statement. As previously noted, the existing Alternative 1 is a containerized freight delivery operation while the proposed Alternative 2 is a bulk fuel transport, bulk transfer, bulk storage, and petroleum product distribution system. That the upper and lower lay down areas have already been developed only indicates that the land has been disturbed. The introduction of bulk fuel storage and distribution equipment is as different as the previously approved NEPA use (Alternative 1) as building a refinery on the disturbed area were being proposed.

Objection 5: Page 4, Public Involvement, Concern related to operational or design

IF and when “included in the EA”, “Best management practices, construction design, and operational features” are oversimplified and trivialized. Best management practices (BMP) do not prevent

2014 Kensington Fuel Depot Environmental Assessment OBJECTIONS
by Gary L. Sonnenberg 27 Nov 2015

degradation of fisheries habitat. They may reduce risk. This is a good example of not understanding the potential consequences of implementing Alternative 2. A release of “significant” volumes of diesel fuel (comparing Alternative 2 to Alternative 1) into the environment was not analyzed or evaluated.

Objection 6: Page 5, Changes and Clarifications to the EA

“Changes and Clarifications” to information contained in the EA should be part of the analysis process and not introduced at the objection phase. If information provided to the public and an IDT was not clear then the process was flawed and any decision(s) based on that information should be vacated until the clarifications have been analyzed in conjunction with other information.

It also is not appropriate to change the EA based on comments from the proponent (Coeur Alaska). If such changes can be proposed by and made on behalf of the proponent why not other commenters’ such as conducting a full EIS?

Objection 7: Page 6, Table 1

Table 1 lists 5 “resources” that were represented by individual members of the FS Interdisciplinary Team (IDT). It does not list the Environment or represent the input or concerns expressed by the technical engineering and environmental member of the team. Although recognizing and comparing some aspects of the two alternatives the comparisons concentrate on construction activities and glosses over risks involved with storing, transferring, and distributing close to 3 times the volume of petroleum product on and near USFS lands without evaluating the risks.

Objection 8:

The EA should and could have presented and analyzed more than two alternatives. At minimum BMPs and “design” modifications offered as mitigations for Alternative 2 could have been proposed for Alternative 1 and evaluated as Alternative 3 without completely overturning the 2004 FSEIS fuel decision.

See <http://www.fs.usda.gov/project/?project=45154> for my comments provided, 25 July 2015 as a private citizen.

These Objections and 25 July 2015 comments were prepared without the benefit of my comments, issues, and concerns presented officially as a member of the FS IDT that are contained on USFS electronic media. Great care was taken to avoid using US Government equipment or official time in preparing private responses to this action. Official contributions and these private communications represent my professional opinion.

Gary L. Sonnenberg

P.O. Box 22555 Juneau, AK 99802

(907)523-9312

2014 Kensington Fuel Depot Environmental Assessment OBJECTIONS
by Gary L. Sonnenberg 27 Nov 2015

rockhnd@earthlink.net

Retired US Coast Guard Officer

Former USFS On Scene Coordinator

Former USFS 0819, Environmental Engineer involved with AML program and numerous petroleum and HAZMAT responses and cleanups on the Tongass National Forest.

Current USDA (USFS) Alternate member Alaska Regional Response Team (ARRT) <http://alaskarrt.org/>

Engineering (design and environmental) representative on USFS IDT for Kensington Mine Fuel Depot EA

Current USFS, Alaska Regional Facilities Engineer